

**Exhibit E**

**Estimated Staffing and Budget Plan**

**STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE  
DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD MAY 1, 2023 THROUGH JULY 31, 2023**

<b>TIMEKEEPER CATEGORY</b>	<b>NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICATION PERIOD <sup>(1)</sup></b>	<b>RANGE OF RATES</b>
Partners	55	\$1,850.00-\$2,165.00
Associates	125	\$550.00-\$1,475.00
Non-Legal Personnel	100	\$425.00-\$595.00

(1) Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).

(2) Includes clerks, legal analysts and eDiscovery professionals.

**ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL  
TO THE DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD MAY 1, 2023 THROUGH JULY 31, 2023**

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS<sup>1</sup></b>	<b>ESTIMATED FEES<sup>2</sup></b>	<b>HOURS BILLED</b>	<b>FEES SOUGHT</b>
ASSET ANALYSIS AND RECOVERY	2850.00	\$3,291,750.00	1,171.10	\$1,588,936.50
ASSET DISPOSITION	6000.00	\$6,930,000.00	2,813.80	\$3,799,530.00
ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	300.00	\$346,500.00	31.10	\$28,506.50
AVOIDANCE ACTION ANALYSIS	1200.00	\$1,386,000.00	4,562.90	\$5,995,892.00
BUSINESS OPERATIONS	600.00	\$693,000.00	599.90	\$808,317.50
CASE ADMINISTRATION	750.00	\$866,250.00	191.50	\$339,285.00
CLAIMS ADMINISTRATION AND OBJECTIONS	1100.00	\$1,270,500.00	323.90	\$427,052.00
CORPORATE GOVERNANCE AND BOARD MATTERS	1200.00	\$1,386,000.00	286.70	\$466,538.00
EMPLOYEE BENEFITS AND PENSIONS	375.00	\$433,125.00	95.20	\$136,379.00

<sup>1</sup> Estimated hours represent high-end of S&C's estimates of hours during the interim fee period.

<sup>2</sup> Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS<sup>1</sup></b>	<b>ESTIMATED FEES<sup>2</sup></b>	<b>HOURS BILLED</b>	<b>FEES SOUGHT</b>
EMPLOYMENT AND FEE APPLICATIONS (S&C)	1050.00	\$1,212,750.00	232.20	\$241,106.00
EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	600.00	\$693,000.00	86.40	\$94,688.50
FINANCING AND CASH COLLATERAL	60.00	\$69,300.00	-	\$0.00
OTHER LITIGATION	1200.00	\$1,386,000.00	693.70	\$960,186.00
MEETINGS AND COMMUNICATIONS WITH CREDITORS	900.00	\$1,039,500.00	114.60	\$209,648.00
NON-WORKING TRAVEL	150.00	\$173,250.00	26.40	\$21,925.10
PLAN AND DISCLOSURE STATEMENT	1400.00	\$1,617,000.00	920.20	\$1,009,745.50
RELIEF FROM STAY AND ADEQUATE PROTECTION	120.00	\$138,600.00	3.10	\$6,711.50
TAX	375.00	\$433,125.00	686.10	\$1,037,361.00
VALUATION	-	\$0.00	-	\$0.00
DISCOVERY	14250.00	\$16,458,750.00	9,279.20	\$6,229,888.00
HEARINGS	150.00	\$173,250.00	53.60	\$104,766.00
FIRST AND SECOND DAY MOTIONS	60.00	\$69,300.00	-	\$0.00
CLAIMS INVESTIGATION	150.00	\$173,250.00	-	\$0.00
GENERAL INVESTIGATION	5400.00	\$6,237,000.00	923.30	\$1,295,749.00
SCHEDULES, SOFAS AND REPORTING	45.00	\$51,975.00	38.30	\$60,509.00
OTHER MOTIONS/APPLICATIONS	1050.00	\$1,212,750.00	453.90	\$483,427.50
TIME ENTRY REVIEW	2250.00	\$0.00	1,100.00	\$0.00
BUDGETING	30.00	\$34,650.00	3.60	\$7,110.00
GENERAL REGULATORY	1500.00	\$1,732,500.00	74.00	\$108,324.00
BAHAMAS MATTERS	1500.00	\$1,732,500.00	1,076.60	\$1,479,253.00
FOREIGN DEBTOR MATTERS	1950.00	\$2,252,250.00	1,248.10	\$1,947,620.00
COORDINATION WITH FOREIGN PROCEDURES	450.00	\$519,750.00	24.00	\$47,730.50
COORDINATION IN OTHER BANKRUPTCIES	1950.00	\$2,252,250.00	936.40	\$1,068,672.50
INVESTIGATIVE REPORTS	900.00	\$1,039,500.00	1,510.80	\$2,310,551.50
<b>Total</b>	<b>51,865.00</b>	<b>\$57,305,325.00</b>	<b>29,560.60</b>	<b>\$32,315,409.10</b>